

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD BRIGGS; RAJ LEE;  
MICHAEL CAMERON; MATTHEW SAUNDERS,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity as Sheriff of Oakland County; CURTIS D. CHILDS, in his official capacity as Commander of Corrective Services; OAKLAND COUNTY, MICHIGAN,

Defendants.

Case No.: 20-cv-10949-LVP  
Hon.: Linda V. Parker

**DECLARATION OF DONALD WALLACE CHANDLER**

I, Donald Wallace Chandler, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently housed in the Oakland County Jail (“Jail”) on the second floor of the main jail building. I am in cell A1C. I have been here since January 3, 2020.

2. I am in a ten-man cell. It is approximately fifteen feet by twelve feet. There are eight bunks and two “boats” in the middle. “Boats” are portable bunks. There are nine people in the cell right now, with two people sleeping on a boat.

3. I suffer from stress-induced seizures and hypertension. I also have a sleep apnea that the Jail refuses to treat. I have back problems that have resulted in multiple surgeries. The surgeries have involved having bone removed from my hips, and so my hips are always in pain as well. I have tried to request medical attention for pain in my back and my hips and nobody has responded. I have lost at least thirty-five pounds since I have been here, due to stress.

4. Social distancing is impossible. We all share a very small shower and a toilet that is in a small, confined space with a sink. People brush their teeth and spit on

the sink. When I use the phone, which is one foot off the ground, people are inches away from me and I am sitting on a bucket with my leg up against the sink. When people wash their hands in the sink it splashes all over me, including in my face.

5. We are given one bottle of DMQ to clean, which we have to use all at one time. About two weeks ago, we started to receive it three times a day. We cannot get it at any other time of day, even if we ask. We were supposed to receive a sponge for cleaning, but we haven't, despite repeated requests. We do not receive any rags for cleaning. We can use a broom, a shower brush, and a Swiffer three times a day, but they are not disinfected between uses. I can see inmates in the cells next to me using them right before they are brought to my cell. This concerns me because the brooms have metal handles, which makes me worry about the transmission of COVID-19.

6. We are given one washcloth and one towel. I used the same washcloth for about a month and a half before finally receiving a new one on April 25, 2020.

7. A couple of guys in another cell in my pod were removed because of suspected COVID-19. According to Sergeant Gilbert, one of the guys in the cell next door was diagnosed with COVID-19. He was removed, but his cellmates were all just left in the same cell. Some have been coughing.

8. My temperature has only been taken twice since the COVID-19 pandemic began, and both times were only in the last week and a half.

9. We receive three bars of soap per week. It is not enough for regular handwashing. I try to ask for more when I run out, but it takes 2 – 3 days to get more.

10. On Thursday, April 23, the deputies posted some signs, but they are posted on the far wall, so everyone can't read them.

11. Most of the guards wear masks, but some of them wear them under their chins. Sometimes they have gloves, but usually just when they are serving food. They generally don't wear gloves when they are handing us things like mail and hygiene supplies (if we get those items at all).

12. Two weeks ago, we received masks that did not cover our noses or mouths completely. On April 22, 2020, we were given new masks, but they also do not fit properly because they are too tight and they smash our noses closed.

13. Our cells are only closed in the front by bars, which are not cleaned regularly. There are vertical bars and horizontal bars. People put their hands on the bars every day. I have only seen the horizontal bars cleaned one time since I got here. I have not seen the vertical bars cleaned at all since I got here.

14. On April 30, 2020, I had a seizure. I remember walking to the bathroom, and then I fell and hit my head on a bunk and started seizing. The other people around me all saw this happen. When I sought medical attention, the nurse told me that I did not actually have a seizure.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

May 2, 2020

/s/ Donald Wallace Chandler  
Donald Wallace Chandler

\*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On May 2, 2020, I personally spoke with Donald Wallace Chandler and read this declaration to him. Donald Wallace Chandler told me that the information in the above declaration is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/ Syeda F. Davidson  
Syeda F. Davidson